

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
CENTRAL DIVISION

CIVIL ACTION NO.: 04-40113-FDS

ELIZABETH R. STEFFENBERG,	)	(Christine S. Collins BBO#639293)
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
T. GENE GILMAN, STEVEN GILMAN,	)	
THE GILMAN INSURANCE	)	
AGENCY, INC., DAVID M. SCOLL,	)	
ARBOR SECURITIES, LTD.,	)	
ALLIANCE INVESTMENT	)	
MANAGEMENT, COMMONWEALTH	)	
FINANCIAL HOLDINGS INC.,	)	
FINANCIAL LINKS, INC.,	)	
T. GILMAN & CO., LTD.,	)	
AVIVA LIFE INSURANCE COMPANY,	)	
TRADETEK, LTD., and	)	
TRADETEK, LLC,	)	
	)	
Defendants.	)	

**MOTION FOR RECONSIDERATION OF**  
**PLAINTIFF, ELIZABETH R. STEFFENBERG, OF THE ORDER DENYING HER**  
**MOTION TO COMPEL RESPONSES OF DAVID M. SCOLL TO PLAINTIFF'S FIRST**  
**REQUEST FOR PRODUCTION OF DOCUMENTS**

NOW COMES Plaintiff, Elizabeth R. Steffenberg, ("Ms. Steffenberg") and submits this Motion for Reconsideration of the Court's (Swartwood, J.) Order denying her Motion to Compel Responses of David M. Scoll to Plaintiff's First Request for Production of Documents, dated December 28, 2004 (the "Order"). As grounds therefore, Ms. Steffenberg states that the Court erroneously interpreted and applied both Massachusetts law concerning the attorney-client privilege and federal law pertaining to the scope of the protections provided by the "ordinary" work product and "opinion" work product doctrines in failing to require Defendant, David M.


Scoll ("Scoll"), to produce the documents in his possession that are responsive to Ms. Steffenberg's Document Request Nos. 19-32, 34-35 and 38-39 in her First Request for Production of Documents. As such, Ms. Steffenberg's Motion for Reconsideration should be allowed. In further support of this Motion, Ms. Steffenberg relies on her Memorandum of Law, filed herewith.

WHEREFORE, Ms. Steffenberg hereby requests that this Court allow her Motion for Reconsideration.

Respectfully submitted,

ELIZABETH R. STEFFENBERG

By her attorneys,



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Dated: February 2, 2005

CERTIFICATE OF SERVICE

I, Christine S. Collins, hereby certify that I have this 2<sup>nd</sup> day of February, 2005 served the foregoing by mailing copy thereof, via first class mail, postage prepaid, to the following:

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Christine S. Collins